

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the matter of

Rural Health Care Support Mechanism

Request for Review of Ilanka Community  
Health Center, Cordova, Alaska

of a Decision of the Universal Service  
Administrator

WC Docket No. 02-60

Form 465 Application No. 43123751

Funding Request No. 12256601

HCP No. 11932

**Request for Review or Waiver**

Pursuant to Sections 54.719 through 54.725 of the Commission's rules, 47 C.F.R. §§ 54.719-54.725, the Ilanka Community Health Center, Cordova, Alaska ("IHC") hereby requests review of a decision of Rural Health Care ("RHC") Division of the Commission's universal service administrator, the Universal Service Administrative Company ("USAC") denying funding for Multiprotocol Label Switching ("MPLS") services purchased by the IHC during the period from February 13, 2013 through June 30, 2013 (the "Funding Denial Letter").<sup>1</sup> In addition, to the extent necessary, the IHC hereby requests a waiver of the Commission's rules governing the RHC support mechanism, as those rules were in effect for the 2012 funding year, to permit it to file any missing documentation with the RHC Division necessary to substantiate its funding request after the June 30, 2013 filing deadline.

**Background**

The IHC provides critically needed primary and urgent care health services delivered by Board-certified health care providers to all residents of and visitors to Cordova, Alaska using a sliding fee scale. IHC is operated by the Native Village of

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<sup>1</sup> Funding Commitment Decision Letter to Ilanka Community Health Center, Funding Request No. 12256601 (Nov. 26, 2013), attached as **Exhibit A**.

Eyak, a federally recognized tribal government located on the southeastern shores of Prince William Sound in the North Gulf Coast of Alaska. It is supported, in part, by funding from the Health Resources and Services Administration (“HRSA”).

Pursuant to the above-referenced Form 465 issued on April 27, 2012, ICHC purchased 4.0 Mbps MPLS service from Alaska Communications Systems to provide terrestrial connectivity to its office location at 508 Chase Street, Cordova, Alaska. During the funding year, the need unexpectedly arose for ICHC to relocate; as a result, on February 13, 2013, ICHC moved to another location in Cordova, Alaska, at 705 Second Street, approximately 0.4 miles – a nine-minute walk – from the original Chase Street location.<sup>2</sup> Its MPLS service followed it to the new location, with no change in price or the purposes for which it was used.

ICHC notified the RHC Division of its new location on June 26, 2013, when it filed its Form 466 for the MPLS service and listed the 705 Second Street address as its service location. Not until September 27, 2013 did ICHC receive a request for clarification of this address change from the RHC Division, at which point ICHC provided the precise date of the move.

On November 26, 2013, the RHC Division issued a letter denying funding for the MPLS service for the portion of the funding year following ICHC’s February 12, 2013 relocation. In accompanying email correspondence, the RHC Division representative conducting the review indicated that, “there should have been a separate application filed

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<sup>2</sup> See **Exhibit B**, a map showing the route between the two locations.

for the new location from February 13 till June 30.”<sup>3</sup> Thus, the RHC Division denied funding, not because of any issue of eligibility of the ICHC or the service it had purchased, nor because of any failure to comply with the Commission’s competitive bidding or other rules governing the program, but simply because ICHC timely filed one Form 466 showing its new address, rather than following the RHC Division’s belatedly announced preference to receive the information through two separate Form 466 funding requests, one for each location.

This appeal to the Wireline Competition Bureau (“Bureau”) ensued.

**A. ICHC Complied with the Commission’s Rules and Policies and Should Receive Support for the Full 2012 Funding Year**

The RHC Division’s denial of funding to ICHC for the period from February 13, 2012 to June 30, 2012 improperly elevates form over substance. The sole reason the RHC Division provided for the denial is that ICHC filed its funding request using one Form 466, rather than two. There is no claim that the new location is ineligible; indeed, the new location is only 0.4 miles from the original location, a negligible distance, particularly in the vastness of Alaska. There is no claim that the service is ineligible; to

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<sup>3</sup> Email from Claudio Ramos, RHC Division, USAC, to Penney Benson, Practice Administrator, ICHC (Nov. [14], 2013), attached as **Exhibit C**. This correspondence shows that the RHC Division originally indicated that funding for the MPLS service would end on May 1, 2013. This was also in error. Nothing in ICHC’s Form 466 indicated that the MPLS service would end on May 1, 2013; to the contrary, the service continued through the end of the funding year. In a related Form 466-A, Funding Request No. 12256661, currently pending with the RHC Division, ICHC sought support for dedicated Internet access (“DIA”) service, to be obtained over the MPLS line. That Form 466-A erroneously stated that the DIA contract end date was May 1, 2013; it should have been June 30, 2013. Nevertheless, nothing in the Form 466 at issue here indicates that the MPLS service for which ICHC seeks support would terminate as of May 1, 2013, and service in fact continued through June 30, 2013.

the contrary, the RHC Division issued support for the first part of the year. There is no claim that ICHC has violated any program rule, or engaged in any waste, fraud, or abuse.

While the dual-Form 466 solution could be one possible approach among many, ICHC has not identified any Commission rule or published RHC Division policy requiring that approach. Indeed, even after a diligent search of the USAC web site and the Commission's rules and orders, ICHC has been unable even to locate definitive guidance – let alone binding rules – to inform health care providers (“HCPs”) participating in the telecommunications service support mechanism that this was the RHC Division's preferred method for receiving notices from HCPs participating in the telecommunications service support mechanism of service location changes during the 2012 funding year. While the Commission has since adopted a new rule in conjunction with the Health Care Connect fund requiring HCPs to notify the RHC Division “within 30 days of a change in the health care provider's name, site location, contact information, or eligible entity type,”<sup>4</sup> that rule was not in existence during the 2012 funding year, nor did the Commission so much as discuss any preexisting notification process when it adopted that rule.

Moreover, ICHC *did*, in fact, provide the RHC Division with notice of its move before the June 30, 2013 filing deadline for Form 466 funding requests, because the ICHC Form 466 filed on June 26, 2013 showed the address of its new location. While ICHC did not provide the precise date of the move, the move of 0.4 miles did not affect

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<sup>4</sup> 47 C.F.R. § 54.601(b) (effective Sept. 9, 2013, *see* 78 Fed. Reg. 54967); *Rural Health Care Support Mechanism*, WC Docket No. 02-60, Report and Order, FCC 12-150, 27 FCC Rcd 16678 (2012), at ¶ 214.

ICHC's eligibility for support, the cost of its service, the allowable distance, or the amount of support it would receive, because it was such a short distance. As such, because the move would have no impact on ICHC's RHC funding, there is no way that ICHC could have anticipated that the RHC Division would find the precise date of the move to be significant, or the omission of that information fatal to its application.<sup>5</sup>

**B. To the Extent Required, ICHC Requests a Waiver of the Filing Deadline to Submit a Supplemental Form 466 for the 705 Second Street Location.**

To the extent that the Bureau believes it necessary, ICHC hereby requests a waiver of the Commission's rules governing the RHC support mechanism, as those rules were in effect for the 2012 funding year and including the June 30, 2013 filing deadline, to permit ICHC to file a second Form 466 (or any other documentation that may be necessary) with the RHC Division to substantiate its funding request for its location at 705 Second Street for the period from February 13, 2013 through June 30, 2013.

The Commission may waive any provision of its rules on its own motion and for good cause shown.<sup>6</sup> A rule may be waived where the particular facts make strict

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<sup>5</sup> The Commission's rules stated during funding year 2012 that, "[e]ach separate site or location of a health care provider shall be considered an individual health care provider for purposes of calculating and limiting support under this subpart," 47 C.F.R. § 54.601(a)(4) (2012). The Commission's original 1997 *Universal Service Order*, in adopting that rule, show that its intent was to confirm that a HCP could receive supported service at each of its locations, selected for each in accord with the competitive bidding rules. *Federal-State Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 97-157, 12 FCC Rcd 8776 (1997), at ¶ 684 (subsequent history omitted). There is no indication that the Commission intended that rule to address situations in which the HCP undergoes a *de minimis* change in its service locations during the funding year. Moreover, the RHC Division has not so applied the rule, continuing to designate ICHC with the same HCP Number both before and after the move.

<sup>6</sup> 47 C.F.R. § 1.3.

compliance inconsistent with the public interest.<sup>7</sup> In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.<sup>8</sup> In sum, waiver is appropriate if special circumstances warrant a deviation from the general rule, and such deviation would better serve the public interest than strict adherence to the general rule.<sup>9</sup>

*First*, special circumstances warrant a deviation from the June 30, 2013 filing deadline for filing Form 466 requests for Funding Year 2012 support. In a highly unusual situation, ICHC inadvertently failed to provide a single item of information – the date of a *de minimis* move from the address shown on its Form 465 to the one shown on its timely Form 466 – that ultimately would have had no impact whatsoever on the amount of support for which it was eligible. Neither the Commission nor the RHC Division had published clear guidance requiring this information or prescribing the form in which HCPs should provide it. And, the RHC Division staff failed to notify ICHC of its preferred means of completing the paperwork, *i.e.*, by filing two Form 466 funding requests, until after the deadline for making such a filing had passed.

A waiver here would result in more effective application of the Commission's overall RHC universal service policy. The overall purpose of the program is to provide support for rural HCPs to enable telemedicine services and improve overall health care. ICHC is a tribally operated clinic that serves an underserved, remote rural area, with a

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<sup>7</sup> *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

<sup>8</sup> *WAIT Radio v. FCC*, 418 F.2d 1153, 1157, (D.C. Cir. 1969), *aff'd sub nom. WAIT Radio v. FCC*, 459 F.2d 1203 (D.C. Cir. 1972).

<sup>9</sup> *Northeast Cellular*, 897 F.2d at 1166.

limited budget supported by HRSA funding. While the specific purpose of the June 30 deadline is to enable the RHC Division, service providers, and HCPs alike to achieve finality and repose with respect to the close of each funding year, no such concerns are at work here. ICHC provided the RHC Division with timely notice of its new location in advance of the deadline in its June 26, 2013 filing. The move did not affect ICHC's eligibility for support or the amount of that support; thus, restoration of that support for the period after February 12, 2013 would not increase demand for support above what would have been expected during the 2012 funding year had ICHC not changed its location. And, given that the Commission has now established a clear rule to govern service location changes in the future, the denial of funding will have little value as precedent.

*Second*, a waiver would serve the public interest. Denial of funding in this case would simply diminish ICHC's ability to serve its community by putting even greater strain on its budget than it already faces, particularly in these difficult economic times. The RHC Division's unannounced policy preference for HCPs to file two Form 466 requests to document location changes during a funding year represents little more than a trap for the unwary – one into which ICHC has now fallen. The FCC's recent rule revisions have now created increased clarity and transparency to govern such situations in the future. Given that the rules have now been clarified and revised, a denial of funding on this basis would have little precedential value. Finally, there are no claims of procurement irregularities or other compliance violations, and no allegation of any other form of waste, fraud, or abuse.

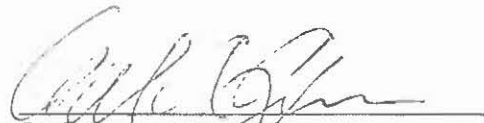
\* \* \* \* \*



For the foregoing reasons, ICHC requests that the Bureau grant this Request for Review; direct the RHC Division to restore support for the period from February 13, 2013 through June 30, 2013, pursuant to the above-referenced funding request; and waive the Commission's rules governing the RHC support mechanism, as those rules were in effect for the 2012 funding year, and including the June 30, 2013 filing deadline, to permit it to file a second Form 466, or such other documentation as may be necessary, with the RHC Division to substantiate its funding request for the period from February 13, 2013 through June 30, 2013.

Respectfully submitted,

ILANKA COMMUNITY HEALTH CENTER



Joel A. Azure  
Executive Director  
Ilanka Community Health Center  
Native Village of Eyak  
P.O. Box 2290  
Cordova, Alaska 99574  
(907) 424-8274

January 27, 2014

cc (by email): Rural Health Care Division  
Universal Service Administrative Company  
2000 L Street, NW, Suite 200  
Washington, DC 20036  
rhc-admin@universalservice.org



# **Exhibit A**

Funding Commitment Decision Letter to Ilanka Community Health Center,  
Funding Request No. 12256601 (Nov. 26, 2013)

From: <rhcadmin@usac.org> Tuesday, November 26, 2013 10:52:48 AM  
Subject: Funding Commitment Letter (FCL) for HCP 11932, FRN 12256601  
To: <suzanne.niemi@gmail.com> Penney Benson

Date: 26-Nov-2013

Exhibit A

Funding Year: 2012  
Health Care Provider (HCP) Name: Ilanka Community Health Center  
HCP Number: 11932  
FCC Form 465 Application Number: 43123751  
Funding Request Number: 12256601

The Rural Health Care (RHC) division of the Universal Service Administrative Company (USAC) has completed the review of the *Funding Request and Certification Form (FCC Form 466)* submitted on behalf of the Health Care Provider (HCP) named above. Based on the information provided, RHC has determined that the HCP is eligible for the estimated support listed below. Additionally, if the HCP submitted a contract or service agreement with the form, the outcome of the contract review is included in this letter.

**HCP Physical Location: 705 Second Street, Cordova, AK, 99574**  
**Service Type: MPLS**  
**Bandwidth: 4.0 Mbps**  
**Service Provider Name: Alaska Communications Systems Holdings, Inc.**  
**Service Provider Identification Number (SPIN): 143002683**  
**Billing Account Number: 1861504**

Funding Start Date	Funding End Date	Months of Support	Non-Recurring Support Amount	Monthly Recurring Support Amount	Total Support Amount
09-Jul-2012	12-Feb-2013	7.17051	\$0.00	\$10,379.03	\$74,422.94

It is the HCP's responsibility to review and verify that all information on this FCL is accurate. All account holders and the service provider listed on the form have received a copy of this FCL. A copy is also saved in the *My Documents* section of *My Portal*.

**Contract/Service Agreement Endorsement Determination: Non-Evergreen/MTM**

**Non-evergreen (or month-to-month) service offering:** If an HCP submits a service agreement that is not signed and dated, or if the type of service, the terms of service, or the duration of the service(s) are not specified, the service agreement will be designated as Non-evergreen, (month-to-month, tariffed service). The HCP must therefore submit an FCC Form 465 and select the most cost-effective service and service provider each year **for the life of the agreement**. In order to be eligible for a full year of funding, the HCPs FCC Form 465 must be posted by June 2nd to satisfy the required 28-day competitive bidding period prior to the start of the funding year on July 1st.

**Your responsibility:**

It is the HCP's responsibility to review the information in this FCL. Contact RHC at [rhc-admin@usac.org](mailto:rhc-admin@usac.org) if there is an error with the amount of support or other information in this FCL.

If, at any time, the supported services are not being provided to the HCP or the HCP is not otherwise receiving the approved support, it is the HCP's responsibility to notify RHC immediately.

The Billing Account Number, certifications, and all other information provided on FCC Forms 465, 466, 466-A, and 467 may be subject to audit by RHC and the FCC.<sup>1</sup> HCPs are subject to audits and other reviews that the RHC and/or the FCC may undertake to ensure that the universal service support is being used in compliance with FCC program rules. If RHC discovers that supported services are not used in compliance with program rules, applicants will be subject to enforcement activities and other means of recourse by RHC and other appropriate federal, state, and local authorities.

#### **Next Steps:**

Complete and submit an FCC Form 467 (*Connection Certification*), which will confirm receipt of the services for which support has been approved, and the date on which the service provider began providing those services. Funding cannot be issued until this form is processed. To submit the FCC Form 467, go to the *My Forms* tab of *My Portal* and find the applicable Form 466 or Form 466-A and click on the "Create 467" button. Once the Form 467 is approved, the HCP and the service provider will receive a copy of the HCP Support Schedule (HSS). Receipt of the HSS is an indicator to the service provider that it should begin crediting the HCP for the support amount (if it has not yet done so) and may begin to invoice USAC.

#### **Appeals:**

Appeals must be electronically date-stamped or postmarked within 60 days of the date of this letter. Letters of appeal must contain the HCP Number, Funding Request Number(s), the SPIN, the affected funding year, and documentation of the decision being appealed (this FCL, denial letter, etc.)

Additionally, FCC rule section 54.721 requires "a statement setting forth the party's interest in the matter presented for review; a full statement of relevant, material facts with supporting affidavits and documentation; the question presented for review. . .[and] a statement of the relief sought and the relevant statutory or regulatory provision pursuant to which such relief is sought."

Failure to include the required information in the letter of appeal or the required documentation to support the appeal will result in a delayed response time, or the appeal may not be considered.

Detailed instructions on filing an appeal may be found at:

[www.usac.org/rhc/about/program-integrity/appeals.aspx](http://www.usac.org/rhc/about/program-integrity/appeals.aspx).

#### **Questions:**

Details about and definitions of all terms used in this FCL are provided on the RHC website ([www.usac.org/rhc](http://www.usac.org/rhc)).

If you have any questions or need assistance, call the RHC Help Desk at 1-800-229-5476, Monday through Friday, 8AM - 8PM, Eastern Time (or at [rhc-admin@usac.org](mailto:rhc-admin@usac.org)).

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<sup>1</sup> 47 C.F.R. 54.619(c).

## **Exhibit B**

Map of Cordova, Alaska, showing the distance from the ICHC location on Chase Street  
to its new location on Second Street



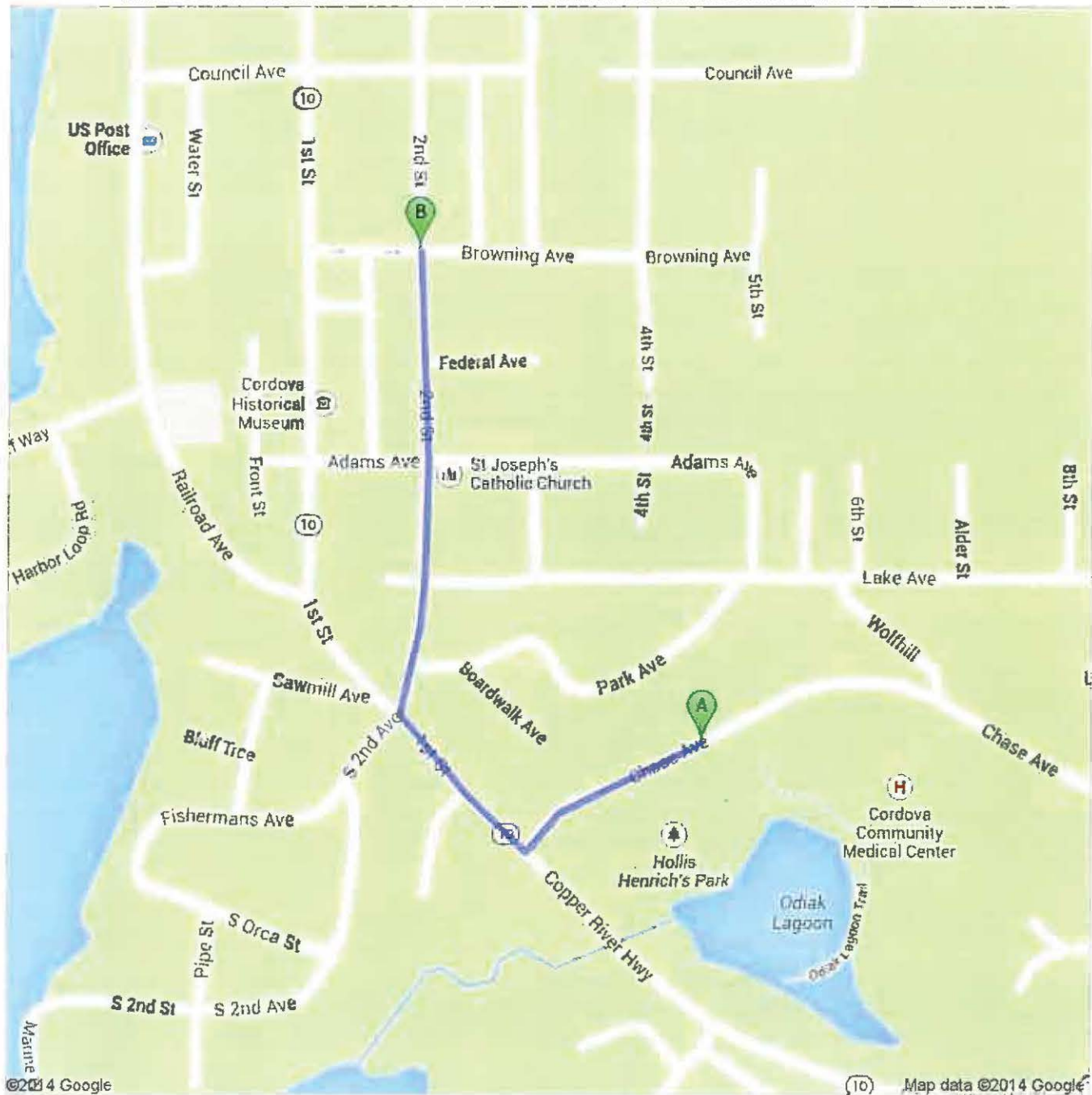


Directions to 705 2nd St, Cordova, AK 99574  
0.4 mi – about 9 mins

Exhibit B

Walking directions are in beta.

Use caution – This route may be missing sidewalks or pedestrian paths.





508 Chase Ave, Cordova, AK 99574

- 
- |  |              |
|--|--------------|
| 1. Head <b>southwest</b> on <b>Chase Ave</b> toward <b>Copper River Hwy</b>  | go 0.1 mi    |
| About 2 mins   | total 0.1 mi |
|  2. Turn right onto <b>Copper River Hwy</b> | go 466 ft    |
| About 2 mins   | total 0.2 mi |
|  3. Turn right onto <b>2nd St</b>           | go 0.2 mi    |
| Destination will be on the left  | total 0.4 mi |
| About 5 mins   |              |



705 2nd St, Cordova, AK 99574

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These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.




Map data ©2014 Google

Directions weren't right? Please find your route on [maps.google.com](https://maps.google.com) and click "Report a problem" at the bottom left.

# **Exhibit C**

Email Correspondence with Claudio Ramos, RHC Division,  
Universal Service Administrative Company



From:  Penney Benson  
"cramos" <cramos@rhc.universalservice.org>  
Subject: Ilanka- Changes to (FCL) for HCP 11932, FRN 12256601  
To:  "Underwood, Colin A." <Colin.Underwood@acsalaska.com>  
Cc:  suzanne.niemi


11/18/2013 1... 

Exhibit C

Collin,  
Please see the emails between Claudio and myself over service site move issue.  
Thanks,  
Penney  
907-424-8274

----- Original Message -----

Penney,

Did you file forms 466/466A for the service in both the old location and new location? If separate forms were not filed then nothing as because the fund year is closed. You may appeal the FCL decision if you do not agree with the funding decision.

If you need help with anything else please don't hesitate to email us again or call the helpline at 1800-229-5476

Thanks,  
Claudio Ramos

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**From:** Penney Benson [<mailto:penney@eyak-nsn.gov>]  
**Sent:** Friday, November 15, 2013 2:56 PM  
**To:** [cramos@rhc.universalservice.org](mailto:cramos@rhc.universalservice.org)  
**Cc:** [suzanne.niemi@gmail.com](mailto:suzanne.niemi@gmail.com)  
**Subject:** Re: Changes to (FCL) for HCP 11932, FRN 12256601  
**Importance:** High

Claudio,  
We only moved 1.2 miles from our previous place of service.  
When we filled out form 465 for 2012 we did not know we would have to move. When we filled out our 466 forms we had moved to our new location so the new address was placed on those forms. I have attached the forms for your info. This shows that we had two places of service for 2012. Will that be sufficient?  
Thank you,  
Penney

Penney Benson  
Practice Administrator  
Ilanka Community Health Center  
Native Village of Eyak  
P.O. Box 2290  
Cordova, AK 99574  
Direct Line (907) 424-8274  
Fax (907) 424-3275

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"cramos" <[cramos@rhc.universalservice.org](mailto:cramos@rhc.universalservice.org)> writes:  
Penney,

*Nov 14, 2013*

I am not sure yet as far as how much funding will be as the system will adjust accordingly. You will receive a revised FCL with the next week or so. I understand the service did not end but there should have been a separate application filed for the new location from February 13 till June 30. Since the fund year is closed and no further applications can be submitted there is not way to fix this. If you do not agree with the decision in the new FCL you will receive within the next week or so you may appeal it.

If you need help with anything else please don't hesitate to email us again or call the helpline at 1800-229-5476

Thanks,  
Claudio Ramos

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**From:** Penney Benson [<mailto:penney@eyak-nsn.gov>]  
**Sent:** Wednesday, November 13, 2013 4:18 PM  
**To:** [cramos@rhc.universalservice.org](mailto:cramos@rhc.universalservice.org)  
**Cc:** [suzanne.niemi@gmail.com](mailto:suzanne.niemi@gmail.com)  
**Subject:** Re: Changes to (FCL) for HCP 11932, FRN 12256601

Claudio,  
What will the total funding amount be? Our service did not end on February 12th it just

continued at our new location, so we still need to be funded through July 30, 2013. What do I need to do to fix this?

Penney

"cramos" <[cramos@rhc.universalservice.org](mailto:cramos@rhc.universalservice.org)> writes:

Penney,

The FCL will be changed for the start date to be July 9 and the end date will be changed to February 12 which is the date moved.

If you need help with anything else please don't hesitate to email us again or call the helpline at 1800-229-5476

Thanks,

Claudio Ramos

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**From:** Penney Benson [<mailto:penney@eyak-hsn.gov>]  
**Sent:** Tuesday, November 12, 2013 10:39 PM  
**To:** [rhcadmin@usac.org](mailto:rhcadmin@usac.org)  
**Cc:** [suzanne.niemi@gmail.com](mailto:suzanne.niemi@gmail.com)  
**Subject:** Changes to (FCL) for HCP 11932, FRN 12256601  
**Importance:** High

I have some changes that need to be made to the following notice:

1. The Ilanka Clinic relocated on February 12, 2013 to 705 Second Street, Cordova, AK 99574. The address needs to be changed on the document.

I have already sent a change of address to rhc-admin and have not received a reply.

2. Funding start date was July 9, 2012

3. The funding end date should be June 30, 2013.

4. Months of support should be 12.

5. Total Support Amount should be \$124,548.36

Date: 05-Nov-2013

Funding Year: 2012

Health Care Provider (HCP) Name: Ilanka Community Health Center

HCP Number: 11932

FCC Form 465 Application Number: 43123751

Funding Request Number: 12256601



The Rural Health Care (RHC) division of the Universal Service Administrative Company (USAC) has completed the review of the *Funding Request and Certification Form (FCC Form 466)* submitted on behalf of the Health Care Provider (HCP) named above. Based on the information provided, RHC has determined that the HCP is eligible for the estimated support listed below. Additionally, if the HCP submitted a contract or service agreement with the form, the outcome of the contract review is included in this letter.

**HCP Physical Location: 508 Chase Street, PO Box 2290, Cordova, AK, 99574**

**Service Type: MPLS**

**Bandwidth: 4.0 Mbps**

**Service Provider Name: Alaska Communications Systems Holdings, Inc.**

**Service Provider Identification Number (SPIN): 143002683**

**Billing Account Number: 1861504**

Funding Start Date	Funding End Date	Months of Support	Non-Recurring Support Amount	Monthly Recurring Support Amount	Total Support Amount
01-Jul-2012	01-May-2013	10.03226	\$0.00	\$10,379.03	\$104,125.13

It is the HCP's responsibility to review and verify that all information on this FCL is accurate. All account holders and the service provider listed on the form have received a copy of this FCL. A copy is also saved in the *My Documents* section of *My Portal*.

Penney Benson  
Practice Administrator  
Ilanka Community Health Center  
Native Village of Eyak  
P.O. Box 2290  
Cordova, AK 99574  
Direct Line (907) 424-8274

Fax (907) 424-3275

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From:  Penney Benson Thursday, October 31, 2013 1:13:47 PM  
Subject: HCP 11932 - immediate ACTION REQUIRED  
To:  rhc-admin@usac.org  
Cc:  suzanne.niemi

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HCP #11932 - Native Village of Eyak/ Ilanka Community Health Center.

I am requesting a change in our service address to 705 Second Street, Cordova, AK 99574.  
This change applies to FRN #s 1211158, 1225666, 1211463 and 1225660.

Please contact me when this change has been completed.

Thank you,

Penney Benson  
Practice Administrator  
Ilanka Community Health Center  
Native Village of Eyak  
P.O. Box 2290  
Cordova, AK 99574  
Direct Line (907) 424-8274  
Fax (907) 424-3275

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----- Original Message -----

Request Type Other Change  
Deadline 11/5/2013  
Requested information. FRN--1211158--



Per your response that the clinic moved in February 2013---you would be required to file two applications--one at original location and one at the new location. The invoice has a price but no location on it. If you wish to file From July 1, 2012 until the move, I require the last date of service at the original site at 508 Chase Avenue, Cordova, AK. Unfortunately since the fund year has closed, you will not be able to file for support at the new location.\*\*\*I must receive your reply by 11/5/13 to receive funding.

-----Original Message-----

From: [rhc-donotreply@usac.org](mailto:rhc-donotreply@usac.org) [<mailto:rhc-donotreply@usac.org>]  
Sent: Tuesday, October 29, 2013 7:51 AM  
To: [suzanne.niemi@gmail.com](mailto:suzanne.niemi@gmail.com); [penney@ilanka.org](mailto:penney@ilanka.org); [penney@eyak-nsn.gov](mailto:penney@eyak-nsn.gov)  
Subject: RHC FCC Form 466 for HCP 11932 - immediate ACTION REQUIRED to process

Health Care Provider (HCP) Name: Ilanka Community Health Center  
HCP Number: 11932  
FCC Form 465 Application Number: 43123751  
Funding Request Number: 1211158  
Service Type: T1 or DS1  
Funding Year: 2012

The Rural Health Care (RHC) division of the Universal Service Administrative Company (USAC) has received the FCC Form 466 submitted by the HCP referenced above. However, RHC cannot process the form without information for FRN 1211158. To view and respond to the request for information, log into My Portal ( <https://rhc.usac.org/rhc/> ), go to Information Requested on the My Documents tab, and click on the "Request Type" hyperlink. Click on "Submit Response" to submit the information requested. Any account holder will be able to respond to an Information Request; once it has been completed, the request is removed from the Information Requests section and the information provided will be saved to your My Documents folder.

The information requested is required to process the above referenced form, and must be submitted to RHC within two weeks of the date of this notification or the HCP will risk losing funding.

Do not reply to this email - RHC does not monitor this account. For questions or assistance about the information request, contact the RHC Help Desk at 1.800.229.5476 or click on the "Contact RHC Help Desk" link in My Portal.